

REMARKS

This is in response to the Official Action dated July 16, 2004.

The specification is amended to correct obvious typographical errors in reference numerals to conform with the drawings.

The claims are amended and represented herein. It is respectfully submitted that the claims as amended are allowable over the art of record.

Claims 8-10, 12, 14 and 15-20 have been rejected as anticipated by Draper, 6,604,236. Reconsideration is requested.

Draper is directed to a technique of updating data on a CD-ROM used by a remote computer. A CD-ROM containing original data is supplied to the remote computer and, when revised data are available, the revised data are transmitted to the remote computer (presumably via a communication link). The original data and revised data are in a hierarchy so that if the user accesses data in the hierarchy, the latest data is provided, whether it is new or revised data. When the remote computer user attempts to access data of the character within the hierarchy, tables are employed to access the most recent data. The Draper system has built in security that the hierarchy of the CD-ROM is essential to gain access to original and revised data. Thus, the rigidity of Draper's hierarchy is important to the function of the Draper system.

Applicant's invention employs two directory structures, the original (first) and updated (second) data structures representing two different (original - first, and updated - second) ASIC design systems. Specification, page 8, lines 7-14. The claims are amended to recite the relationship of the version of an ASIC design system to the data structure, thereby further distinguishing from Draper. An IC is defined by directories of the first directory structure. Applicant's invention allows the

definition of the IC to be automatically updated by a customer to the updated ASIC design system. Claims 8-14 are directed to the process of updating the IC definition using a software tool to create a new computer file for the IC, initially defined by directories in the first directory structure, where the new computer file is in directories of the second directory structure and the second ASIC system.

Draper, on the other hand, requires all data be ordered into a fixed hierarchy (structure). Thus, Draper does not implicitly nor explicitly disclose

a computer process of generating a second computer file that defines an integrated circuit in ... a second directory structure based on a second version of an ASIC design system using a first computer file that defines the integrated circuit in a first directory structure based on a first version of an ASIC design system different from the second version,

as recited in claim 8. Nor does Draper implicitly nor explicitly disclose that

the first computer file contains ... lines [having] source names referencing first computer-readable directories of a first directory structure based in the first ASIC design system,

as recited in claim 8.

Draper's file system map file is based on the file system hierarchy of the original data, not between two directory structures based on different ASIC design systems. Thus, Draper does not implicitly nor explicitly disclose

a software tool that maps directory references between the first directory structure and a second directory structure by source name,

as recited in claim 8.

Dependent claims 9, 10, 12 and 14 have been rejected as anticipated by Draper. However, for the reasons given concerning parent claim 8, these claims also distinguish from Draper. Moreover, as described above, Draper does not create a second computer file that defines an IC in a second version of an ASIC

design system. Consequently, claims 10, 12 and 14 further distinguish from Draper.

Claim 15 is directed to the software tool that is used to create the second computer file defining the IC based on the second version of an ASIC design system. Thus, Draper does not implicitly nor explicitly disclose a computer useable medium having a computer-readable software tool for

a computer containing a first computer-readable file that defines an integrated circuit in a first directory structure containing first computer-readable directories based on a first version of an ASIC design system to create a second computer-readable file defining the integrated circuit in second computer-readable directories of a second directory structure based on a second version of an ASIC design system different from the first version,

nor wherein

the first computer-readable file contains ... lines [having] source names referencing directories of the first directory structure,

both as recited in claim 15. Nor does Draper implicitly or explicitly disclose that the software tool comprises that identifies "source names in each line of the first computer-readable file" which are oriented to the first ASIC design system, and substitutes "the directory reference associated with each source name from the first directory structure to the second directory structure" which are oriented to the second version of an ASIC design system, as recited in claim 15.

Claims 16-20 were rejected for the same reasons as claims 9, 10, 11, 10 and 13, respectively, as corresponding the process recited therein. Presumably, since claims 11 and 13 were rejected in a different rejection based on Draper and Yazadani (discussed below), claims 18 and 20 are rejected on that basis as well and are separately discussed below. For the reasons given above, claims 16, 17 and 19 are allowable over Draper.

Thus, the rejection of claims 8-10, 12, 14 and 15-20 as

anticipated by Draper should be withdrawn.

Claims 11 and 13, and presumably claims 18 and 20, were rejected as unpatentable over Draper in view of Yazadani, 6,625,597. Reconsideration is respectfully solicited.

Yazadani describes the use of design dictionaries defining parameters of IC designs. There is nothing in Draper or Yazadani suggesting application of Draper's CD-ROM update to IC designs, much less to creating computer files defining IC designs in a second version of an ASIC design system as defined in claims 11, 13, 18 and 20, and their parent claims. Accordingly, it is not obvious to combine the teachings of Draper and Yazadani, and in any event the combination would not make obvious Applicant's invention or claims for the reasons give above.

Claims 1-7 have been rejected as unpatentable over Draper in view of Tabloski, 5,999,729. Reconsideration is respectfully requested.

Claims 1-7 are directed to the process of creating the software tool. Draper does not explicitly or implicitly disclose a process of generating a software tool

that causes a computer to create computer files that define integrated circuits as a plurality of second computer-readable directories in a second directory structure based on a second version of an ASIC design system,

None of the steps recited in claim 15 is described or made obvious by Draper. Draper does not

[provide] a plurality of first computer-readable directories arranged in a first directory structure based on a first version of an ASIC design system different from the second version,

nor

[compare] the first and second computer-readable directories to identify differences between the first and second directory structures [which are based on different versions of an ASIC design system],

nor

[generate] a computer-readable map file containing a plurality of items, each referencing a difference between the first and second directory structures by an associated source name,

nor

[generate] a computer-readable code representing a difference between the first and second directory structures associated with [each] respective source name,

nor

[generate] the software tool based on the computer-readable codes, the software tool being executable by a computer to cause the computer to respond to computer files that define the integrated circuit in the first directory structure to generate the computer files that define the integrated circuit in the second directory structure,

all as recited in claim 1.

The Examiner agrees that Draper does not disclose sorting the items of the mapping file into an ordered list based on the source names,

but cites Tabloski in an attempt to meet this feature. Tabloski is also cited for the specific sort algorithm described by Applicant in claim 2.

Tabloski teaches, at Figs. 6A and 6B, sort programs for sorting data represented as source file 41, which may be identified by a "file specifier" (Tabloski col. 15, line 56). In Draper, data are mapped by storing checksums, which are based on the data, in a meta-data table. (See Draper Fig. 2.) It is respectfully submitted that nothing in Tabloski suggests or makes obvious the specific sort algorithm of claim 2, and that nothing in Tabloski or Draper suggests that it would be obvious to one of ordinary skill in the art to employ Tabloski's sort program for Draper's checksum calculation and storage.

For the above reasons, the rejection of claims 1-7 as unpatentable over Draper in view of Tabloski should be withdrawn.

Favorable reconsideration and early allowance are respectfully solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 12-2252.

Respectfully submitted,

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